UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SYRACUSE MOUNTAINS CORPORATION,

Plaintiff,

Civil Action No. 1:21-cv-02684-VEC

v.

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

NOTICE OF INTENT TO PRESENT PROTECTED MATERIAL AT THE

HEARING SCHEDULED FOR MARCH 7, 2022

Pursuant to paragraph 6.5 of the Stipulated Confidentiality Agreement and Protective Order entered November 1, 2021 (ECF 30), Defendant hereby advises the Court of Defendant's intent to discuss Protected Material at the hearing scheduled for March 7, 2022. Defendant defers to the Court on the procedure to be followed by the parties at the hearing with respect to Protected Material.

Dated: March 3, 2022

Respectfully submitted,

HOGAN LOVELLS US, L.L.P.

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